

Revision 4

5 April 2025

Identification of products and parts - Identification information, provision, and replacement

General

Civil Aviation Authority ACs contain information about standards, practices and procedures that the Authority has found to be an **acceptable means of compliance** with the associated rule.

Consideration will be given to other methods of compliance which may be presented to the Authority. When new standards, practices or procedures are found to be acceptable they will be added to the appropriate AC.

Purpose

This AC describes an acceptable means of compliance with Part 21, *Certification of Products and Parts*, Subpart Q, *Identification of Products and Parts*. It is intended for a product manufacturing organisation, or a person performing maintenance, in completing or replacing product identification markings.

Related Rules

This AC relates specifically to Part 21, Subpart Q.

Change Notice

Revision 4 makes stylistic and formatting changes to align with current AC style.

Version History

History Log

| Revision No. | Effective Date | Summary of Changes |
|---------------|----------------|--|
| AC21-6, Rev 0 | 6 Aug 1995 | Initial issue |
| AC21-6, Rev 1 | 25 Dec 1997 | Renumbered as AC21-80a |
| AC21-6, Rev 2 | 27 April 2007 | Renumbered as AC21-06 as part of a project to standardise the numbering of ACs |
| AC21-6, Rev 3 | 8 March 2023 | <p>Clarified standards for data plates, serial numbers and other identification plates</p> <p>Clarified that Part 21, Subpart Q, applies to Part 148 Manufacturing Organisations producing a type-certificated product</p> <p>Corrected typos and other minor errors and clarifies requirements for Special Category aircraft</p> <p>Formatted this AC in line with current ACs</p> <p>Added a Version History</p> |
| AC21-6, Rev 4 | 5 April 2025 | Makes stylistic and formatting changes to align with current AC style. |

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Identification of Products and Parts

Note: To assist readers with cross-referencing, the numbering of the paragraphs contained within this circular corresponds generally with the numbering of Part 21, Subpart Q.

General

Identification is required on certain products and parts used in the aviation industry to enable traceability of the product or part, and confidence in the product's or part's fitness for use.

Identification information is required on:

- aircraft, aircraft engines, and propellers
- critical parts, and
- certain replacement and modification parts.

In accordance with (IAW) rules 21.191(6), *Standard and restricted category requirements*, and the equivalent provisions under rules 21.193 through to 21.201, the different special category requirements, aircraft need to be identified IAW Part 21, Subpart Q, before they can be issued with a standard, restricted or special category airworthiness certificate.

Rule 21.803 – Identification of aircraft, aircraft engines, and propellers

General

Part 21, Subpart Q, applies to Part 148 Manufacturing Organisations producing a type-certificated product (aircraft, engine or propeller). It also applies to anyone producing critical parts or replacement parts. Identification of products and parts is essential for continuing airworthiness purposes.

The identification information is to be marked:

- on a fireproof plate attached to the product, or
- directly on the part by an acceptable fireproof marking method.

Acceptable fireproof marking methods include:

- etching
- stamping
- engraving.

The identification should be easily accessible but protected from normal operating damage and the possibility of loss during an accident.

If the plate is covered under certain conditions, or enclosed in any manner, its accessibility would be considered acceptable if it can be revealed without the use of tools.

Note: The aircraft manufacturer data plate under rule 21.803 is separate to the aircraft identification plate required under rule 47.119, Identification plate. The manufacturer data plate could serve both purposes, however, if it also contains the aircraft nationality and registration marks.

Aircraft identification

An aircraft's fireproof plate may be located either:

- at an accessible location near an entrance, or
- externally on the fuselage.

An accessible location near an entrance may be either external or internal. If internal, the location of the plate would be considered acceptable if it is legible to a person at or within the entrance to the aircraft.

For an aircraft with more than one entrance, the appropriate entrance for the plate to be placed would be the one most used by the flight and servicing crews.

If the fireproof plate is located externally on the fuselage, it should be mounted near the tail surfaces and be legible to a person on the ground. (It is an FAA requirement that all N-registered aircraft have an identification plate on the rear fuselage.)

Modular turbine engine identification

Separate sections of the turbine engine, or modules, are devoted to particular functions. A typical engine consists of a compressor module, combustion module, turbine module, and exhaust module. Maintenance on modular engines is normally accomplished by replacing entire modules. These modules are approved as a part of the complete engine type design, and not independently approved.

Aircraft engine manufacturers will identify each complete engine by the means specified in rule 21.803, normally by affixing an engine data plate to one of the modules. The engine data plate does not identify the individual module but rather, the assembly of modules that make up the complete engine. A particular module, therefore, serves only as a vehicle on which to affix the engine data plate.

For good equipment management, owners need to maintain a continuous history on the basic engine, its modules, and any non-modular components such as fuel lines and accessories. This is required even if every module or component has been replaced any number of times. The history of an engine, including its modular and non-modular components, is tracked by the engine serial number on the data plate and corresponding historical and modification records.

The replacement of a module where the engine data plate is attached, **without** moving the data plate, results in a loss of identity for the engine and thus should be avoided.

The engine data plate is always the control for establishing and maintaining the engine's approval status. The data plate installed by the engine manufacturer should, therefore, remain with the particular engine throughout its useful life.

Propellers, propeller blades and hubs identification

For ease of identification, the markings required on propellers and propeller blades and hubs should be placed in an area where they would be legible without disassembly or on the propeller.

Rule 21.805 – Identification information

The product manufacturer's name, the model designation and the serial number are the minimum identification information that will be required.

Manufacturer's name

The manufacturer's name on the data plate may be:

- a corporation
- a company
- a partnership
- an association, or
- an individual, including an amateur builder.

Model designation

Many aircraft have popular names that are sometimes incorrectly used as the model designation. Examples are:

- Cessna Skymaster (correct model designation T337G)
- Piper Tomahawk (correct model designation PA-38-112).

The correct model designation should be used on the data plate.

Serial number

The serial number should be the number supplied by the manufacturer. For an amateur-built aircraft it should be the serial number assigned by the airframe kit or plans manufacturer. For an original design by a builder, the serial number can be as nominated by the builder, provided it is unique.

Identification information variations

The identification required on products identified in Part 21, Subpart Q, varies according to:

- the country of origin of the product, or
- the category of airworthiness certificate applied to the aircraft.

Country of origin variations

Part 21, Subpart Q, applies directly to those products produced in New Zealand by a Part 148-certificated aircraft manufacturing organisation.

Imported products and parts should carry identification information IAW the regulations of the country of manufacture which is:

- comparable to that required by Part 21, Subpart Q, and
- marked by a fireproof method such as those specified in Part 21, Subpart Q.

Airworthiness certificate category variations**Standard and restricted categories**

For the issue of a standard or restricted category airworthiness certificates IAW Part 21 Subpart H, *Airworthiness Certificates*, aircraft, engines, and propellers need to be identified by the means specified in Part 21, Subpart Q.

Experimental airworthiness certificates

To issue an experimental airworthiness certificate, the aircraft must be identified by the means specified in Part 21, Subpart Q, but does not require all of the information that is prescribed for a standard or restricted category (type-certificated) aircraft.

The identification of an aircraft to be issued with an experimental airworthiness certificate need only include:

- the manufacturer's name
- the model designation, and
- the manufacturer's serial number.

Ex-military aircraft

When issuing an experimental airworthiness certificate to an ex-military aircraft it is acceptable for the identification information to vary slightly. The military designations assigned to the aircraft at the time of production may be used as the manufacturer's name, the model designation, and the manufacturer's serial number.

If the original data plate is missing, a replacement plate may be accepted if there is substantial documentary evidence that the identity to be used is that of the aircraft being certificated.

In some cases an ex-military aircraft may not have a data plate as such, but it should be possible to establish the aircraft's identity clearly by logbook records.

Rule 21.807 – Removal, alteration, and replacement of identification information

This rule covers the removal, alteration and replacement of the identification *information*. It should not be confused with the removal and re-installation of the data *plate* which is covered by rule 21.809, below.

Standard and restricted category products

The identification attached to products should contain the original production information. The manufacturer must be contacted if this information is to be removed, altered or replaced.

If a new or modified data plate is required, a written submission should be made to CAA containing the specific circumstances and the proposed action. CAA will then check the product records and provide a suitable endorsement to the manufacturer. The manufacturer will approve the modification or re-issue a new data plate.

A maintenance logbook entry should be made with reference to CAA's endorsement and manufacturer's approvals.

Experimental airworthiness certificated aircraft

An aircraft issued with an experimental airworthiness certificate does not require an original data plate, but the data plate used should contain the minimum information as detailed in this AC.

Rule 21.809 – Removal and reinstallation of data plate

Persons performing maintenance IAW Part 43 may remove the data plate containing the information prescribed in rule 21.805 when needed during maintenance.

The requirements in this rule apply to all aircraft operated IAW New Zealand rules.

The removal of a data plate would be considered necessary during certain maintenance operations, including:

- caustic cleaning
- paint removal
- sandblasting, or
- when the structure where the data plate is fastened has to be repaired or replaced for maintenance purposes.

Note: *Replacing or repairing structure where the data plate is attached generally refers to localised replacements and not complete replacement of the next highest assembly.*

The product data plate removed during maintenance operations must be reinstalled on the same product and in the same location.

Methods, techniques and practices acceptable to the Director should be used when a product's data plate is to be replaced. This will include accepted product maintenance manual procedures.

Rule 21.811 – Identification of critical parts

The identification of critical parts should include the part number and serial number of the part. If identification numbers are to be used, they should be equivalent to the part and serial number and enable unique identification of the part.

Rule 21.813 – Identification of replacement and modification materials, parts, and appliances

For parts manufactured IAW a New Zealand Technical Standard Order (TSO) authorisation or a New Zealand Parts Manufacturing Approval, the manufacturer is required to include specific information on the items produced by them.

If a replacement or modification item is manufactured for a person to install on their own product that item must be identified clearly to ensure the item can be:

- clearly identified separately from otherwise acceptable items, and
- related directly to its manufacturing data.

The requirements for these items were put in place to ensure that they do not enter the normal parts market.